



COMPLAINT FORM

The purpose of this form is to assist you in filing a complaint with the Coordination and Review Section. You are not required to use this form; a letter with the same information is sufficient. However, the information requested in the items marked with a star (*) must be provided, whether or not the form is used.

1. * State your name and address.

Name: [REDACTED]

Address: [REDACTED] a/c

Zip: [REDACTED]

Telephone No: Home: [REDACTED] Work: [REDACTED]

2. * Person(s) discriminated against, if different from above:

Name: _____

Address: _____

Zip: _____

Telephone No: Home: () Work: ()

Please explain your relationship to this person(s).

3. * Agency and department or program that discriminated:

Name: State of NC, Justice System, EPA, Granville County, Creedmore

Any individual if known: * Judge Henry W Hight, Jr, Officer [REDACTED]

Address: * Superior Court Resident Judge Oxford NC and Couch
Oil Co of Durham, NC, Attorneys, Zip

Telephone Number: ()

4A. * Non-employment: Does your complaint concern discrimination in the provision of services or in other discriminatory actions of the department or agency in its treatment of you or others? If so, please indicate below the base(s) on which you believe these discriminatory actions were taken (e.g., "Race: African American" or "Sex: Female").

- ☒ Race/Color: African - American
☐ National origin: _____
☐ Sex: _____
☐ Religion: _____
☐ Age: _____
☐ Disability: _____

4B.* Employment: Does your complaint concern discrimination in employment by the department or agency? If so, please indicate below the base(s) on which you believe these discriminatory actions were taken (e.g., "Race: African American" or "Sex: Female").

___ Race/Color: _____
___ National origin: _____
___ Sex: _____
___ Religion: _____
___ Age: _____
___ Disability: _____

5. What is the most convenient time and place for us to contact you about this complaint?

24 hours a day

6. If we will not be able to reach you directly, you may wish to give us the name and phone number of a person who can tell us how to reach you and/or provide information about your complaint:

Name: _____ Tel. _____

7. If you have an attorney representing you concerning the matters raised in this complaint, please provide the following:

Name: No

Address: _____

_____ Zip _____

Telephone Number: () _____

8.* To your best recollection, on what date(s) did the alleged discrimination take place?

Earliest date of discrimination: Jan 10, 1997

Most recent date of discrimination: 1998 + 1999 + 2000

9. Complaints of discrimination must generally be filed within 180 days of the alleged discrimination. If the most recent date of discrimination, listed above, is more than 180 days ago, you may request a waiver of the filing requirement. If you wish to request a waiver, please explain why you waited until now to file your complaint.

Attempts have been ongoing since Jan. 10, 1997
to get assistance from various government agencies
(especially The Environmental Protection Dept),
numerous lawyers, Federal and State officials.

10.* Please explain as clearly as possible what happened, why you believe it happened, and how you were discriminated against. Indicate who was involved. Be sure to include how other persons were treated differently from you. (Please use additional sheets if necessary and attach a copy of written materials pertaining to your case.)

Unfair removal of us from property we had contracted to purchase in Oxford, Granville County N.C. after we discovered-- per EPA of NC-- that property was contaminated. We wanted sellers and Couch Oil Co of Durham to clean it up before we went to settlement. Please see attachments.

We loss \$2,500,00.00 of food, beverages, sundries, equipment and cash. The basement of the store was loaded with tools and contractor's tools and equipment. The computers and cash registers had to be left since they would not let us on the property in defiance of Judge Hight's Order to allow us to have time to remove our belongings.

I want the earnest money returned and to be reimbursed for over approximately

11. The laws we enforce prohibit recipients of Department of Justice funds from intimidating or retaliating against anyone because he or she has either taken action or participated in action to secure rights protected by these laws. If you believe that you have been retaliated against (separate from the discrimination alleged in #10), please explain the circumstances below. Be sure to explain what actions you took which you believe were the basis for the alleged retaliation.

12. Please list below any persons (witnesses, fellow employees, supervisors, or others), if known, whom we may contact for additional information to support or clarify your complaint.

Name	Address	Area Code/Telephone Numbers
		W:() (H):()
		W:() (H):()
		W:() (H):()
		W:() (H):()
		W:() (H):()
		W:() (H):()
		W:() (H):()
		W:() (H):()

13. Do you have any other information that you think is relevant to our investigation of your allegations?

14. What remedy are you seeking for the alleged discrimination?

To be reimbursed for earnest money and deposit money paid on property and \$2,500,000.00 paid on bringing the property upto code approval, such as new plumbing, electric, gas, obtaining license to sell beverages, accept Food Stamps, etc.

15. Have you (or the person discriminated against) filed the same or any other complaints with other offices of the Department of Justice (including the Office of Justice Programs, Federal Bureau of Investigation, etc.)?

Yes _____ No X

If so, do you remember the Complaint Number? _____

Against what agency and department or program was it filed?

Address: _____

City, State, and Zip Code: _____

Telephone Number: () _____

Date of Filing: _____ DOJ Agency: _____

Briefly, what was the complaint about? _____

What was the result? _____

16. Have you filed or do you intend to file a charge or complaint concerning the matters raised in this complaint with any of the following?

_____ U.S. Equal Employment Opportunity Commission

☒ Federal or State Court

_____ Your State or local Human Relations/Rights Commission

_____ Grievance or complaint office

17. If you have already filed a charge or complaint with an agency indicated in #16, above, please provide the following information (attach additional pages if necessary):

Agency: _____ Date filed: _____

Case or Docket Number: _____ Date of Trial/Hearing: _____

Location of Agency/Court: _____

Name of Investigator: _____


Status of Case: _____

Comments: _____

18. While it is not necessary for you to know about aid that the agency or institution you are filing against receives from the Federal government, if you know of any Department of Justice funds or assistance received by the program or department in which the alleged discrimination occurred, please provide that information below.

EPA

19. * We cannot accept a complaint if it has not been signed. Please sign and date this complaint form below.

 04-05-00
(Date)

Please feel free to add additional sheets to explain the present situation to us.

We will need your consent to disclose your name, if necessary, in the course of any investigation. Therefore, we will need a signed Consent Form from you. (If you are filing this complaint for a person whom you allege has been discriminated against, we will in most instances need a signed Consent Form from that person.) See the "Notice about Investigatory Uses of Personal Information" for information about the Consent Form. Please mail the completed, signed Discrimination Complaint Form and the signed Consent Form (please make one copy of each for your records) to:

United States Department of Justice
Civil Rights Division
Coordination and Review Section
Post Office Box 66560
Washington, D.C. 20035-6560

Toll-free Voice and TDD: (888) 848-5306
(202) 307-2222
TDD (202) 307-2678

20. How did you learn that you could file this complaint? _____

US Dept of Justice

21. If your complaint has already been assigned a DOJ complaint number, please list it here: _____

If a currently valid OMB control number is not displayed on the first page, you are not required to fill out this complaint form unless the Department of Justice has begun an administrative investigation into this complaint.



NOTICE ABOUT INVESTIGATORY USES OF PERSONAL INFORMATION

NOTICE OF COMPLAINANT AND INTERVIEWEE RIGHTS AND PRIVILEGES

Complainants and individuals who cooperate in an investigation, proceeding or hearing conducted by DOJ are afforded certain rights and protections. This brief description will provide you with an overview of these rights and protections.

- A recipient may not force its employees to be represented by the recipient's counsel nor may it intimidate, threaten, coerce or discriminate against any employee who refuses to reveal to the recipient the content of an interview. An employee does, however, have the right to representation during an interview with DOJ. The representative may be the recipient's counsel, the employee's private counsel, or anyone else the interviewee authorizes to be present.

- The laws and regulations which govern DOJ's compliance and enforcement authority provide that no recipient or other person shall intimidate, threaten, coerce or discriminate against any individual because he/she has made a complaint, testified, assisted or participated in any manner in an investigation, proceeding, or hearing conducted under DOJ's jurisdiction, or has asserted rights protected by statutes DOJ enforces.

- Information obtained from the complainant or other individual which is maintained in DOJ's investigative files may be exempt from disclosure under the Privacy Act or under the Freedom of Information Act if release of such information would constitute an unwarranted invasion of personal privacy.

There are two laws governing personal information submitted to any Federal agency, including the Department of Justice (DOJ): The Privacy Act of 1974 (5 U.S.C. § 552a), and the Freedom of Information Act (5 U.S.C. § 552).

THE PRIVACY ACT protects individuals from misuse of personal information held by the Federal Government. The law applies to records that are kept and that can be located by the individual's name or social security number or other personal identification system. Persons who submit information to the government should know that:

- DOJ is required to investigate complaints of discrimination on the basis of race, color, national origin, sex, disability, age, and, in some instances, religion against recipients of Federal financial assistance. DOJ also is authorized to conduct reviews of federally funded recipients to assess their compliance with civil rights laws.

- Information that DOJ collects is analyzed by authorized personnel within the agency. This information may include personnel records or other personal information. DOJ staff may need to reveal certain information to persons outside the agency in the course of verifying facts or gathering new facts to develop a basis for making a civil rights compliance determination. Such details could include the physical condition or age of a complainant. DOJ also may be required to reveal certain information to any individual who requests it under the provisions of the Freedom of Information Act. (See below)

- Personal information will be used only for the specific purpose for which it was submitted, that is, for authorized civil rights compliance and enforcement activities. Except in the instances defined in DOJ's regulation at 28 C.F.R. Part 16, DOJ will not release the information to any other agency or individual unless the person who supplied the information submits a written consent. One of these exceptions is when release is required under the Freedom of Information Act. (See below)

- No law requires a complainant to give personal information to DOJ, and no sanctions will be imposed on complainants or other individuals who deny DOJ's request. However, if DOJ fails to obtain information needed to investigate allegations of discrimination, it may be necessary to close the investigation.

- The Privacy Act permits certain types of systems of records to be exempt from some of its requirements, including the access provisions. It is the policy of DOJ to exercise authority to exempt systems of records only in compelling cases. DOJ may deny a complainant access to the files compiled during the agency investigation of his or her civil rights complaint against a recipient of Federal financial assistance. Complaint files

are exempt in order to aid negotiations between recipients and DOJ in resolving civil rights issues and to encourage recipients to furnish information essential to the investigation.

- DOJ does not reveal the names or other identifying information about an individual unless it is necessary for the completion of an investigation or for enforcement activities against a recipient that violates the laws, or unless such information is required to be disclosed under FOIA or the Privacy Act. DOJ will keep the identity of complainants confidential except to the extent necessary to carry out the purposes of the civil rights laws, or unless disclosure is required under FOIA, the Privacy Act, or otherwise required by law.

THE FREEDOM OF INFORMATION ACT gives the public access to certain files and records of the Federal Government. Individuals can obtain items from many categories of records of the Government -- not just materials that apply to them personally. DOJ must honor requests under the Freedom of Information Act, with some exceptions. DOJ generally is not required to release documents during an investigation or enforcement proceedings if the release could have an adverse effect on the ability of the agency to do its job. Also, any Federal agency may refuse a request for records compiled for law enforcement purposes if their release could be an "unwarranted invasion of privacy" of an individual. Requests for other records, such as personnel and medical files, may be denied where the disclosure would be a "clearly unwarranted invasion of privacy."



COMPLAINANT CONSENT/RELEASE FORM

Your Name: [REDACTED]

Address: [REDACTED]

Complaint number(s): (if known) _____

Please read the information below, check the appropriate box, and sign this form.

I have read the Notice of Investigatory Uses of Personal Information by the Department of Justice (DOJ). As a complainant, I understand that in the course of an investigation it may become necessary for DOJ to reveal my identity to persons at the organization or institution under investigation. I am also aware of the obligations of DOJ to honor requests under the Freedom of Information Act. I understand that it may be necessary for DOJ to disclose information, including personally identifying details, which it has gathered as a part of its investigation of my complaint. In addition, I understand that as a complainant I am protected by DOJ's regulations from intimidation or retaliation for having taken action or participated in action to secure rights protected by nondiscrimination statutes enforced by DOJ.

CONSENT/RELEASE

☒ **CONSENT** - I have read and understand the above information and authorize DOJ to reveal my identity to persons at the organization or institution under investigation. I hereby authorize the Department of Justice (DOJ) to receive material and information about me pertinent to the investigation of my complaint. This release includes, but is not limited to, personal records and medical records. I understand that the material and information will be used for authorized civil rights compliance and enforcement activities. I further understand that I am not required to authorize this release, and do so voluntarily.

☐ **CONSENT DENIED** - I have read and understand the above information and do not want DOJ to reveal my identity to the organization or institution under investigation, or to review, receive copies of, or discuss material and information about me, pertinent to the investigation of my complaint. I understand this is likely to impede the investigation of my complaint and may result in the closure of the investigation.

North West Enterprise Cando Corporation

SIGNATURE

DATE

4-6-9000

Recall of letter sent to: 97 CVS 23

Henry W. Hight, Jr.
Resident Superior Court Judge
County of Granville
Oxford, No Carolina

Your Honor:

From Kelli:

I don't know whether
if this was with the
package because

when the computer
start messing up,
this was under the
printer stuck.

But I still make
3 copies any way
as be on the same
side.

I think you should be made aware of it
that the premises involved in
97 CVS 23 has been broken into. The
County has not protected my rights.

County took my keys away from me
leaving all of my possessions were still in
property and gave the keys to the seller.
I have receipts for the proof of purchase
items removed. Some items (such as tobacco
) were sold by the plaintiff before
break in.

you will remember, I was forced to
leave off the property with only ten(10)
minutes notice--no formal notice, thus

not allowing time for me to take ^{new} ~~any~~ ^{entire} ~~any~~ ^{entire} possessions away.

Shortly after ward you ordered a Consent Order that would permit ~~Buyer~~ ^{Buyer} to go on ~~to the store~~ ^{to remove his} possessions. (copy attached). However, the two attorneys -- Willie Darby and James T. Duckworth and The County Sheriff took it upon themselves ^{to} defy your order and refused to let the buyer to even enter upon the grounds surrounding the building. Is this the way the Law works in Granville County? If so there is no need for a Judge if the attorneys and subordinates ignore the Judge's orders and do whatever they want. Maybe this is an example of how other people have been treated in this County and State. To me the defendant's civil rights have been trampled on by the very justice system that is suppose to protect his civil rights.

- - - - -

(Above, is what I can remember of the letter.)

United States Senate

WASHINGTON, DC 20510-3301

January 19, 1997

[REDACTED]
Northwest Enterprise Corp.
P.O. Box 1025
Oxford, NC 27565

Dear [REDACTED]:

Thank you for your recent letter. Naturally, I want to try to be helpful in any way I possibly can.

[REDACTED], since this matter comes under the jurisdiction of the State of North Carolina, I have taken the liberty of contacting the North Carolina Department of Environment, Health and Natural Resources requesting their attention to your inquiry. I feel sure someone from that office will be in touch with you.

Please be assured that I do appreciate your concern. I hope you will not hesitate to contact my office if we can ever lend a helping hand.

With kind regards.

Sincerely,



Jesse Helms
United States Senate

JH/ew

Northwest Enterprise [REDACTED] page 2

Also, the seller, [REDACTED] was aware of the repairs and visited the site of the to see how the repairs were coming along. Every thing done - new air conditioning (central), new wiring thru out the bldg, new plumbing, etc, met with his approval. He agreed with the work being done but said he would not pay for any thing.

We got all of the above done, left to be done was the parking lot - to be repaved. In digging up the area, contaminated soil was discovered. There are two gas pumps located in the parking area. The State and local governments were immediately called and reports made to them. The State report is now back: Facility ID # 0-029743. The owners have been charged with several violations.

Our reporting suspected contamination apparently aggravated the seller and the owner of the tanks: Couch Oil Co.

So on Friday, January 10, 1997, at approximately 1:30 pm, the Sheriff of Oxford County, the seller, his wife and his attorney came to 116

S. Durham Av and told us we had 10 minutes to get out of the building. The Sheriff laid a letter, dated January 3, 1997, ^{on the desk} telling us about the pending action. We did not receive this letter that was addressed to an address where there is no mail box. I immediately called the Post Master, Creedmoon, to ask what would happen to mail in this instance. He told me that the mail would be returned to the sender. The only record the P.O. would have ~~would~~ would be that of a registered letter or a certified letter. This represents negligence on the attorney's failure to properly serve us.


Now, we are locked out of the building with all of our records kept away from us; it is time to file ~~our~~ Federal and State Tax reports; a sum of money; other people's property locked away; likewise, all of our perishable foods are doing just that -- perishing. We will sustain a great loss by being kept away from our business as well as our employees will suffer from lack of income.

Northwest Enterprises

page 4

I would appreciate any help that you can give us in getting back into our place of business. As you can see, I need to get back to my typewriter and our employees need to be able to continue to draw a salary.

Respectfully Submitted,

 President
Northwest Enterprises Corp
PO Box 1025
Oxford NC 27565


cc: Eddie Woodhouse
Senator Helms Office

United States Senate

WASHINGTON, DC 20510-3301

OFFICIAL BUSINESS

 U.S.S.

, President
Northwest Enterprise Corp.
P.O. Box 1025
Oxford, NC 27565

**1312 Annapolis Drive, Suite 202
Raleigh, North Carolina 27608
telephone (919) 834-2700
facsimile (919) 834-4414**

Mailing Address:
Post Office Box 10888
Raleigh, NC 27605-0888

Greenville Office
1694 E. Arlington Blvd., Suite E
Greenville, NC 27858
Telephone (919) 756-1883
Facsimile (919) 756-1797

Northwest Enterprises Corporation
P. O. Box 1025
Oxford, NC 27565

Dear [REDACTED]:

Pursuant to Mr. Barefoot's request, I have enclosed a memorandum listing the chronology of events which have occurred in the above-referenced matter. Please review this information for accuracy and call our office with any changes or additions to these items.

Should you have any questions, please do not hesitate to contact our office.

Sincerely,

Bonnie J. Gibat

Bonnie F. Gibat
Administrative Assistant

Enclosure

MEMORANDUM

TO: [REDACTED] # 00327

FROM: TNB

DATE: May 16, 1997

RE: CHRONOLOGY OF EVENTS

"CDM" refers to [REDACTED]

"ST" refers to [REDACTED]

"NW Ent. Corp" refers to Northwest Enterprises Corp.

"the property" refers to the property in Creedmoor which was to be sold to CDM (excluding the house in Durham)

DATE	EVENT	NOTES	DOC. "
late 1995	CDM and Mary drove by site and saw sign on property which said "For Sale by Owner"		
11/95 ?	CDM calls # on for sale sign and talks with ST (in Fayetteville)	ST said the sales price for the Creedmoor property was \$200,000 (nothing said about house in Durham)	
12/5/95	ST faxes plat/map of "the store in Creedmoor, NC" to CDM	Fax says to: "Smart Corporation" to the attn of "Mr. [REDACTED]"	0017-19

[REDACTED]

DATE	EVENT	NOTES	DOC. #
1/3/96	<p>Standard NC Bar Assn. Offer to Purchase form was filled in by CDM for Creedmoor Property</p> <p>On the back page [0022] none of the Standard Provisions have been stricken. See esp. #s 1 "Earnest Money", #8 "Inspections", and #17 "Entire Agreement"</p>	<ul style="list-style-type: none"> - NW Enterprises is listed as the only Buyer - it is signed by ST - only says Creedmoor property - price \$325,000 - \$500 earnest money - list of property attached - deed to be made to Northwest Enterprises with personal guaranty by CDM - ST's name is stricken out and the contract marked VOID - "Property sold as is" - "Buyer reserves the right to have any and all inspections b/f going to settlement" - Deed to made to: NW Ent. (personal guarantee by CDM) 	0021-22
1/3/96	Addendum to 1/3/96 Offer to Purchase	<ul style="list-style-type: none"> - hand written by ?? - Buyer is listed as "Northwest Enterprises" - misc kitchen/appliances - "2 gasoline pumps" - signed by ST & CDM - marked "VOID" 	0020

DATE	EVENT	NOTES	DOC. #
1/4/96	typed contract, Mary prepared it.	<ul style="list-style-type: none"> - does not mention Durham house - only Creedmoor property - \$325,000 - "NW Enterprises/CDM, as Buyer" - property sold "as is" - closing on 1/17/96 - deed is to be made to "NW Enterprises (personal guarantee by CDM)" - "Buyer shall be allowed to inspect the property b/f going to settlement" - Signed by "NW Enterprises, CDM, President" 	0026 & 0027
1/9/96	atty McDaniel's ltr to CDM	<ul style="list-style-type: none"> - he received the 1/4/96 contract - "It is my understanding that you will order all inspections in a timely fashion to close on Jan. 17, 1996. Please inform my office if all inspections are satisfactory so that we can inform the seller that the closing will take place." 	0028
b/f 1/17/96	inspection of the property by someone from Mitchell Insurance at the request of CDM	Mitchell Ins. said that he could not get insurance with parking lot in that condition; it had to be repaired	

DATE	EVENT	NOTES	DOC. #
b/f 1/17/96	CDM's meeting with McDaniel in atty's office	<p>meeting in McDaniels' office</p> <ul style="list-style-type: none"> - CD was concerned about env'l contamination - CD took pictures of property - CD now says there were signs of contamination - CD thought there was contamination but he didn't say anything - ST told CD that tanks had just been put in - ST told him that there was no contamination - CD complained about parking lot - CD had Mitchell Ins. Co. come out previously - Mitchell Ins. said that he could not get insurance with parking lot in that condition; it had to be repaired 	
1/16/97	Receipt to Northwest Enterprises Corp. from (I think this is DEHNR) for cost of copies of 73 pages of documents	CDM paid with check # 1266	0074

DATE	EVENT	NOTES	DOC. #
1/23/96	NW Enterprises Check # 1452 to Royster, Royster & Cross Trust Acct for \$1,500 [CDM's atty for closing]	- On the check appears: "Deposit for Lot 63, 64, 66 Lyon Crest"	0030
B/f 1/31/96	inspection by Mr. Wm. Hester, Granville Co. Building Inspector	see letter with results of inspection at Doc. # 0033	
1/31/96	ltr from Granville County Chief Building Inspector, William E. Hester, Jr. to "To whom it may concern"	- Hester had inspected the buildings and listed numerous deficiencies that had to be corrected before electrical power could be placed back on the bldg. - verify that CDM was present during this inspection. - Did ST get a copy of this?	0033
2/5/96	CDM's ltr to ST	- CDM says he has asked for the key to the building so that he can make the inspections "as regard to the safety of the sructure and the utilities" - "Continued delay in getting the needed inspections and known repairs completed could even lead to my requesting refund of the earnest deposit money and withdrawal of offer to purchase."	0035

DATE	EVENT	NOTES	DOC. #
2/7/97	ltr from Atty Robert E. Cooper of Chapel Hill, NC to CDM	<ul style="list-style-type: none"> - Cooper met with CDM and Mary Harvin on 1/20/97 to discuss the lawsuit. - Cooper wanted CDM to associate Tom Currin of Oxford to assist with lawsuit. - CDM did not keep appointment with Currin - Cooper never accepted representation of CDM - reminds CDM that he needs to file an answer to the complaint by Monday, 2/10/97 	0089
B/f 3/7/96	Draft "Settlement Statement" prepared by Thornton McDaniel, Jr. as atty for CDM.	<ul style="list-style-type: none"> - Settlement Date is listed as March 7, 1996 - \$325,000 sales price - only Creedmoor Property listed - Borrower listed as "Northwest Enterprises Can Do Corporation, PO Box 38, Bryans Road, Maryland 20616" 	0023-24
4/4/96	City of Creedmoor Water Dept. - NW Ent paid \$50 deposit for "meter deposit"	The City's receipt is made out to "Northwest Enterprises"	0036
4/30/96	fax from atty McDaniel to CDM	<ul style="list-style-type: none"> - enclosed was a "revision of closing statement" to show add'l payments of buyer [the enclosure is Doc. # 0038-39] 	0037
4/30/96	"revision of closing statement" from atty McDaniel to CDM	<ul style="list-style-type: none"> - settlement date is given as May 1, 1996 - same terms as on previous drafts: no mention of Durham house and sales price of \$325,000 	0037-38

DATE	EVENT	NOTES	DOC. #
5/15/96	proposal from Oxford Heating & Cooling to CDM for \$13,600 worth of equipment and repairs on the HVAC system	our copy does not indicate if this proposal was accepted	0040
1996	tax statement for value of property [0025]	Total appraised value \$83,672	0025
8/5/96	handwritten notes - author unknown	At top it says "Attn: Tony Arnold and Bobby Green" - appears to be a list of tasks to be done to get bldg in condition to operate business	0041-43
8/21/96	Handwritten note saying "Permit Fees" for CDM 8/21/96	Paid fee for zoning permit and plumbing permit and occupancy permit [0047] Cancelled check for these fees of \$45.00 [0046]	0047 and 0046
8/21/96	Certificate of Occupancy issued by Office of the Building Inspector of Creedmoor, NC permit # 1382	issued by Gerald Wilson, Building Inspector - issued to "CDM - Northwest Enterprises"	0045
8/25/96	City of Creedmoor Business and Professional License to operate a grocery store	The permit is issued to "Northwest Enterprises"	0044
8/29/96	fax to atty Christopher G Harper, atty in Chapel Hill, from CDM	enclosing copy of 1/4/96 purchase agreement b/t ST, sellers and "Northwest Enterprises/CDM, as buyer"	0048-4
8/30/96	ltr from atty Cross (McDaniel's firm) to CDM	saying closing will be 9/6/96 - cc: ST	0054
8/30/96	another draft Settlement Statement by James Cross (atty for CDM)	- closing date of 9/6/96 - still no mention of house in Durham - still \$325,000 - name and address of borrower is listed as "Northwest Enterprises Can Do Corporation"	0052 and 0056

DATE	EVENT	NOTES	DOC. #
8/30/96	envelope from Cross to CDM	This is addressed to CDM at the store's address of 116 S. Durham Ave, Creedmoor, NC - The Postal Service stamped the envelope "NO MAIL RECEPTABLE"	0057
9/5/96	CD faxes to ST the superceding contract which Mary Harvin again prepared	at the top of the page it states: "THIS CONTRACT SUPERCEDES CONTRACT DATED January 4, 1996." - This copy of the contract is signed by Northwest Enterprises Corp, Buyer, and CDM; not signed by ST - only terms changing were amt. of earnest money and financing terms. - no mention of Durham house - still \$325,000	0050-5.
9/5/96	CDM faxed contract to Atty Taylor	919-782-0799	0053
10/2/96	note that Tommy Clemmons stopped by	Clemmons is with DOT and this referred to fixing the parking lot; the State agreed to CD's plan	0060
11/1/96	contamination found in parking lot		

DATE	EVENT	NOTES	DOC. #
11/7/96	ltr to Edmundson to atty Cross [0062-63]	<ul style="list-style-type: none">- he informs atty Cross that ST desires to change the financing arrangement- ST also wants clause put in Deed of Trust that CD would not remove USTs w/o permission of ST- he also wants CD to give financing statement on all equipment which is included in the sale- he wants to see insurance policy with ST named as an additional insured	0062-63
11/14/96	Atty Cross' faxed ltr to CDM, enclosing Edmundson's ltr of 11/7/96	"I just received this correspondence from Mr. Edmundson." I tried to return your telephone calls and trust you got my messages. In order for this firm to continue to represent you, you must first remit a check in the amount of \$8,500 to cover existing closing costs and additional attorney fees."	0061

DATE	EVENT	NOTES	DOC. #
11/27/96	<p>CDM's ltr to ST in reponse to the 11/7/96 ltr from Edmundson</p> <p>cc's to Atty Cross and Edmundson</p>	<ul style="list-style-type: none"> - letter is on NW Ent. Corp's stationary and address is listed is same as the store's address - "As you know, the State Environmental people are now involved and so any transfer of title has been put on hold." - "I still hold to the verbal agreement that we made that the house in Durham would be included in the \$325,000 transaction but was left out of the offer to purchase." - it is an inappropriate time to request a financing statement - CDM has incurred expenses of \$183,000 "trying to get the property into a safe condition." - "The time for requesting this statement surely would have been at the beginning or at the writing of the agreement. Just like the inclusion of the house in Durham (verbal agreement) at the time of the writing." - "you will remember the insurance company refused to write coverage for the property because of the condition of the parking lot--hence the digging up and attempt to repave which has lead to the discovery of the leaks/water in gas discovey and contamination of soil ... Of course, I must be able to get insurance coverage." 	0066 and 0064-65

DATE	EVENT	NOTES	DOC. #
11/27/96 (need date)	<p>CDM's ltr to ST and wife</p> <p>From: "Northwest Enterprises Cando Corporation"</p> <p>Certified Mail receipt signed by ST on 11/27/96 [0067] and by [REDACTED] on 11/27/96 [00068]</p>	<p>"The amount you owe Northwest Enterprises for repairs - plumbing, electrical, roofing, building repairs, parking lot, equipment repairs, wiring, heating is \$183,000."</p> <p>"We started work on this property in March 1996 and we continue to find necessary repair work. Also, contaminated soil."</p> <p>"Please submit a check to Northwest Enterprises in the amount of \$183,000 immediately."</p>	0069
1/3/97	<p>ltr from [REDACTED] to CDM re: trespassing on property</p> <p>This was never mailed to CDM; CDM says it was hand delivered by the sheriff on 1/10/97 when CDM was arrested at the store. CDM was told he had 10 minutes to get off property.</p>	<ul style="list-style-type: none"> - Formally advising CDM that he is "in violation of NCGS 14-106, the second degree trespass statute." - says CDM never had express or implied consent to be on property nor authority to operate a business - notification to leave immediately and not re-enter premises. - "Failure to comply with these instructions may trigger the initiation of an additional legal process, either civil, criminal or both." 	0070

DATE	EVENT	NOTES	DOC. #
1/14/97	ltr from atty Cross to CDM	<ul style="list-style-type: none">- "Once you transfer the appropriate funds to our trust account and set a closing date, we will be delighted to assist you again."- "Unfortunately, the time constraints of our firm will not permit us to assist you with your continuing contract negotiations with [REDACTED] or your related environmental problems. We would be willing to suggest another attorney to handle these matters on your behalf."	0072
1/28/97	ltr from atty Cross to CDM	<ul style="list-style-type: none">- CDM had a conference with Cross on the Monday preceding 1/28/97. The conference was about the amount of attorney's fees owed by CDM to the Cross law firm.- The law firm will be performed by the law firm	0085